

STATE OF NEW YORK
COUNTY OF ERIE

SUSAN LINDGREN, being duly sworn, deposes and says:

1. I was a pretrial detainee in the Erie County Holding Center from approximately July 23 through July 24, 2005.
2. I am a diabetic. When I was arrested, I asked whether I could bring my medicine and blood sugar tester. I was told I could not because medical attention would be provided at the holding center.
3. I was initially held in the Bull Pen for 13 hours. The room is approximately 12x8, I shared the room with 12 people and there was not enough room for people to sit down. There were feces, vomit and dried blood on the wall, floor, and in/and around the toilet. There was a strong odor of urine and body odor.
4. There was no toilet paper available, when I asked the deputies for toilet paper, they laughed at me. Detainees were forced to use slices of bread from their lunch as toilet paper.
5. I asked repeatedly for medicine for my diabetes and a test kit to test my blood sugar but neither was provided and their reply was "Don't worry about it, you're not the only diabetic that came through here." As a result of my diabetes, I became very thirsty and when I tried to drink from the sink, the water pressure was so low that the water didn't flow. The deputies gave me juice to drink but as a diabetic, I couldn't drink juice without my medicine.
6. I was held in the Bull Pen for approximately 13 hours and when I was transferred to the Court hold at about 1:00 a.m., I shared the Court hold with up to 16 people. The floor was wet and there was feces, dried blood, and vomit on the wall. Again, the room smelled strongly of urine.
7. While in the Court hold, one of the women begged for a sanitary napkin as she was menstruating and the blood had stained through her clothing. A deputy answered, "I'm not your friend."
8. Some of the women asked for blankets and again the deputy stated. "I'm not your friend." No blankets were provided.

9. Later that day I was arraigned, released and returned home. When I arrived home, my blood sugar was 325 and normal blood sugar range is between 80 and 100.
10. My time in the holding center was the worst of my life. The odor, filth and the overcrowding was unbearable.


SUSAN LINDGREN


NOTARY PUBLIC

SHERITA PRUITT
No. 01PR6128482
Notary Public, State of New York
Qualified in Erie County
My Commission Expires June 27, 2009

Sworn to before me this
5th day of October 2005